

**Air Pollution Control District
Jefferson County, Ky
26 January 2003**

TITLE V PERMIT SUMMARY

Company: DuPont Dow Elastomers L.L.C. - Louisville Plant

Plant Location: 4242 Camp Ground Road, Louisville, KY 40216

Date App. Received: 22 April 1997

Date Admin. Complete: 21 June 1997

Date of Draft Permit: 26 January 2003

Date of Proposed Permit:

District Engineer: Patrick Schmidt

Permit No.: 108-99-TV

Plant ID: 1259

SIC Code: 2822

NAICS: 325212

AFS: 01259

Introduction:

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as of the date above as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM₁₀), and ozone (O₃) (1 hour standard); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}) and ozone (O₃) (8 hour standard).

Application Type/Permit Activity:

- Initial Issuance
- Permit Revision
 - Administrative
 - Minor
 - Significant
- Permit Renewal

Compliance Summary:

- Compliance certification signed
- Compliance schedule included
- Source is out of compliance

I. Source Description

1. **Class I Area Impacts:** This source is not located in or near a Class I area.
2. **Product Description:** The source manufactures Neoprene elastomers.
3. **Overall Process Description:** The source operates three processing areas and a fourth supporting area in manufacturing Neoprene (polychloroprene) elastomer products. The monomer area (emission units M-1 through M-6) receives, stores, and refines chloroprene; manufactures a co-monomer (ACR); stores other raw materials and by-products in tanks, including toluene, acetic acid, dilute hydrochloric acid, and waste organics from chloroprene refining; and loads waste organics into tank trucks for shipment off-site to RCRA-permitted treatment, storage, and disposal facilities. Chlorine is delivered to the site in railcars that supply the manufacturing process directly. The polymerization area (emission units P-1 through P-5) includes raw material storage and unloading facilities, monomer weigh tanks, solution make-up tanks, reactors, storage tanks for unstripped polymerized emulsion, strippers, storage tanks for stripped polymerized emulsion, and processing tanks and loading equipment for Neoprene latex products. The finishing area (emission units F-1 through F-3) includes mixing and blending tanks, additive and coagulant tanks, finishing lines, product dryers, and packaging equipment for dry Neoprene products. The supporting area operations includes wastewater treatment and an extruder. The site has several maintenance shops for pump repair, insulation work, and woodworking, including two paint spray booths where minor maintenance touch-up spray can painting is done.
4. **Site Determination:** E. I. DuPont de Nemours & Co., Inc. owns the DuPont Fluoroproducts processes covered in a separate Title V permit, No. 160-97-TV, and owns 50% of DuPont Dow Elastomers L.L.C. which is covered in this permit. It has been determined per a November 25, 1997, letter from Steven Riva, U.S. EPA, that these companies are under common control and are one source for Title V applicability purposes. However, the companies operate separately and will operate under separate Title V permits.
5. **Emission Unit Summary:**
 - a. **Monomer Units M-1 through M-6:** Crude chloroprene (BCD) is received in railcars and stored in nitrogen-padded, fixed-roof tanks, where it is chilled with refrigerated brine to prevent auto-polymerization. It is distilled and the refined chloroprene is stored in refrigerated tanks while the impurities removed in the distillation process are pumped to waste organic storage tanks for shipment off-site for disposal at RCRA-permitted treatment, storage, and disposal facilities. The chloroprene monomer storage tanks supply the rest of the plant. In the ACR manufacturing process, 1,3-dichloro-2-butene (DC) is manufactured from chloroprene and anhydrous hydrogen chloride gas supplied by pipeline from a neighboring facility. Hydrochloric acid vapors

containing trace organics that result from this operation are controlled by a two-stage Venturi scrubber that uses water as the removal medium. The acidic water from the two-stage Venturi scrubber is neutralized with lime in the plant's wastewater treatment operation (emission unit X-1). The dichlorobutene is then reacted with chlorine and other reagents in a multi-step process and refined to produce dichlorobutadiene. Extensive control systems, including two scrubbers and an absorber, are in place to handle any upsets or problems with the chlorine system. Toluene is received in tank trucks and stored in a fixed-roof tank. Acetic acid is received in railcars, diluted, and stored in fixed-roof tanks. Chlorine is delivered in railcars that supply the manufacturing process directly. Dilute hydrochloric acid is received by pipeline from a neighboring facility and stored in fixed-roof tanks.

- b. Polymerization Units P-1 through P-5:** Refined chloroprene is measured out in "large weigh tanks" before being transferred to the large polymerization kettles (LPKs). Dichlorobutadiene is added to the chloroprene in the "large weigh tanks" for Neoprene products that include this comonomer. Water-based solutions, toluene-based stabilizers, and stripper inhibitor solutions are made in smaller make-up tanks. Each LPK is equipped with a vent condenser which returns condensate to the reactor. After polymerization, the unstripped Neoprene emulsion is transferred, typically into a "drop tank," if it is to be finished as a dry Neoprene product, or to an "aging tank" if it is a Neoprene latex type. Unstripped emulsion from these tanks is then steam stripped under a vacuum to remove unreacted monomer, and the resulting stripped emulsion moves to hold tanks or mix tanks before further processing. Each stripper is equipped with three condensers in series. The first condenses water containing trace amounts of organics. This water flows through a "hot well," which is a ventilated catch tank, and then to the plant's wastewater collection system. All of the plant's wastewater is pumped to the MSD Morris Forman Wastewater Treatment Plant under a Wastewater Discharge Permit administered by MSD's Industrial Waste Division. The second and third condensers recover unreacted chloroprene. The recovered chloroprene is treated with brine and decanted to remove excess water, and stored in refrigerated tanks until it can be mixed with crude chloroprene and re-refined in the Monomer area. The water decanted from the recovered chloroprene is captured in the plant's wastewater system. Non-condensable gases that were either dissolved in the polymerized emulsion or that entered the stripper systems are also vented through the hot well to the atmosphere. From the hold tanks, stripped Neoprene emulsion destined for sale as Neoprene latex products is transferred to the latex "storage" tanks for final processing. Finished Neoprene latex products are packaged in drums or totes at a drumming station, or are pumped to a loading rack for bulk shipments to customers in tank trucks. Stripped Neoprene emulsion to be finished as a dry product is transferred to mix tanks in preparation for blending, and further processing in the Finishing emission units F-1 through F-3. The extruder

operation (emission unit X-2) obtains stripped Neoprene emulsion in totes from these mix tanks.

- c. **Finishing Units F-1 through F-3:** Stripped Neoprene emulsion from the Polymerization emission units is blended in tanks, mixed with finishing additives prepared in dedicated make-up tanks, coagulated at low temperature, and washed before being fed into one of the dryers operating in parallel. Each dryer has separate vents from its steaming, venting, and cooling sections. After the dryers, the Neoprene film is cooled, gathered into ropes, cut into "chips," and dusted with talc to keep the chips from sticking together. Talc is supplied by supersacks to talc receivers that supply the feeder/contactors for dusting the Neoprene chips. The Neoprene chips are then packaged for shipment. The talc receivers vent through a filter and vacuum pump to the atmosphere. Talc dust collected from cutters, conveyors, talc handling, and packaging is returned to the process by feed bins which also supply the talc receivers. Chips that fall out of the chip conveyors are also recovered by placing them in chip receivers that transfer the chip back to the packaging operation. Chip receivers also vent through a filter and vacuum pump to the atmosphere.
 - d. **Miscellaneous Units X-1, X-2, and MSC:** Wastewater treatment (X-1) receives dry lime and mixes it with water in lime slurry storage tanks. In the event that dry lime is unavailable, the lime unloading system is capable of receiving direct shipments of lime slurry. The lime slurry is used to neutralize acidic effluent water in a neutralization system before the effluent water is discharged to the MSD force main. The site can hold a limited amount of wastewater on-site in diversion tanks if the wastewater is determined to vary from the wastewater discharge permit limits. An emergency containment basin is used to hold water that cannot be pumped to MSD because of excessive rainfall, pump failure, or the unavailability of the MSD force main. The extruder system (X-2) mixes stripped Neoprene emulsion with Kevlar™ aramid fiber and other additives, coagulates the mixture, feeds it through an extruder to form an engineered elastomer product containing Neoprene, and cuts the product into strips which are dried and packaged for shipment. The miscellaneous (MSC) emission unit includes parts washers that use non-halogenated cold solvent and a carpentry shop operated by the site's primary contractor that uses a cyclone to collect sawdust.
6. **Fugitive Sources:** Fugitive emissions of volatile organic hazardous air pollutants (HAPs) from process equipment are regulated by 40 CFR Part 63, Subpart U, *National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins*. Fugitive emissions of dust from any part of the plant are subject to Regulation 1.14, *Control of Fugitive Particulate Emissions*. In addition, if equipment was constructed after September 1, 1976, fugitive emissions of particulate matter from that equipment are subject to Regulation 7.08, *Standards of Performance for New Process Operations*.

7. Title V Major Source Status by Pollutant:

Pollutant	Actual Emissions 2001 Data (tpy)	Major Source Status (based on PTE)
CO	Negligible	Yes*
NO _x	13.29	Yes*
SO ₂	Negligible	No
PM	Negligible	Yes
VOC	342.6	Yes
Single HAP > 1 tpy		
Chloroprene	258.26	Yes
Toluene	24.48	Yes
Hydrogen Chloride	1.9	Yes*
Total HAPs	283.22	Yes

* This site is only a major source for these pollutants when combined with the emissions from E. I. de Nemours & Co.

8. MACT Standards: This site is a major source of HAPs based on actual HAP emissions. It is an existing affected source subject to the provisions of 40 CFR Part 63, Subpart A, *General Provisions* and 40 CFR Part 63, Subpart U, *National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins*. It is an elastomer product process unit (EPPU) producing Neoprene as its primary product, using the organic HAPs chloroprene and toluene, and is a major source of emissions of those organic HAPs.

9. Applicable Requirements:

PSD NSPS SIP Other
 NSR NESHAPS District-Origin MACT

The District has reviewed all construction, reconstruction, and modifications to determine PSD/Non-attainment NSR applicability to this source. There have been two construction, reconstruction, or modifications that triggered the significant levels listed in Regulation 2.04, *Construction or Modification of Major Sources in or Impacting upon Non-Attainment Areas (Emission Offset Requirements)*, and Regulation 2.05, *Prevention of Significant Deterioration of Air Quality* and the source "netted out" for both projects. Therefore, the District has determined that PSD/Non-attainment NSR does not apply to this source.

10. Referenced Federal Regulations in Permit:

40 CFR Part 60, Subpart A	General Provisions
40 CFR Part 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (After July 23, 1984)
40 CFR Part 63, Subpart A	General Provisions
40 CFR Part 63, Subpart U	National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins
40 CFR Part 68, Subparts A,B,D through H	Chemical Accident Prevention Provisions

II. Regulatory Analysis

1. **Emission and Operating Caps:** The source is subject to a plant-wide emission cap of 4,377 pounds of volatile organic compounds (VOCs) per day for all equipment subject to Regulation 6.24.
2. **Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
3. **Operational Flexibility:** The source did not request to operate under any alternative operating scenarios in its Title V permit application.
4. **Testing Requirements:** The source is required to perform PM stack testing for emission units F-2 and F-3, in accordance with EPA reference Test Method Five (5).
5. **Monitoring, Record Keeping and Reporting Requirements:** The source is required to monitor and maintain records of various operating parameters to demonstrate compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.

Periodic Monitoring:**a. Emission Units M-1 through M-6:**

- i. **VOC -** The source shall keep daily records of appropriate production-related information, as specified in the permit for each emission unit M-1 through M-6, and use calculation methodology similar to that in the Regulation 6.24 compliance demonstration, to demonstrate compliance with Regulation 6.24. The Regulation 6.24 compliance demonstration shows that the stripper vent condensers (emission unit P-4) contribute over 90% of the required 85% VOC emission reduction. The source continuously monitors the stripper

vent condenser temperature with an alarm system that is activated when the temperature exceeds 0°C. The compliance demonstration shows that when the temperature remains at or below 0°C the site-wide VOC emission reduction is at a minimum of 92.7%. The source is required to monitor and record the temperature of the chloroprene in the crude chloroprene storage tanks, on a daily basis, to verify that the vapor pressure as stored is less than 1.5 psia. Additionally, 40 CFR Part 63, Subpart U, is applicable to certain M-1 through M-6 emission points, and the monitoring requirements as specified in the MACT standard shall apply. The headspace pressure limit for Emission Unit M-1 and the refining column pressure limit for Emission Unit M-2 will ensure that the one-time VOC compliance demonstration calculations, submitted on December 17, 2001 in response to EPA's e-mail requesting information dated July 31, 2001, remain valid. EPA initially requested this pressure limit during a conference call with the District on May 5, 2002.

- ii. **TAPs** - The source shall keep records showing that the modeling parameters have not changed for HCl and Toluene. For emission points in emission unit M-4 that are controlled by the two-stage Venturi scrubber, the source is required to monitor and record, on a daily basis, the flow rate of water to each stage of the 2-stage Venturi scrubber (C104) on each day that the emission unit M-4 is operating. The source is also required to monitor and record, on a daily basis, the water flow rates to the scrubbers in emission unit M-5. In addition, the source is required to monitor and record, on a weekly basis, the concentration of caustic solution in the absorber in emission unit M-5. For the other TAPs the source shall document process changes to demonstrate that the process changes do not involve a net emissions increase.
- iii. **PM** - For all emission points subject to Regulation 7.08: There are no monitoring, record keeping, or reporting requirement for emission units M-1 through M-6. The source has submitted uncontrolled one-time compliance demonstrations that show the PM emission limitation at maximum PM handling rates cannot be exceeded. Thus, the designation of "regulatory allowable" has been used in place of a specific numeric PM emission limitation.
- iv. **Opacity** - For all emission points subject to Regulation 7.08: The source is required to perform weekly visible emission surveys for emission unit M-2 (emission point 102I1) and emission unit M-4 (emission point 104B8). Emission points that are observed for twelve consecutive operating weeks to be free from visible emissions of particulates are eligible for monthly monitoring. However, any emission points that are monitored monthly that are observed to have

visible emissions of particulates are required to return to the weekly monitoring schedule for at least another twelve-week period. The periodic visible emissions surveys, coupled with Method 9 observations, if necessary, are adequate to demonstrate compliance with the applicable opacity standard.

b. Emission Units P-1 through P-5:

- i. **VOC** - The source shall keep daily records of the number of charges processed and use the calculation methodology in the Regulation 6.24 compliance demonstration to demonstrate continuous compliance with Regulation 6.24, and the calculation methodology in the Title V permit application to demonstrate compliance with Regulation 7.25. The Regulation 6.24 compliance demonstration shows that the stripper vent condensers (emission unit P-4) contribute over 90% of the required 85% VOC emission reduction. The source continuously monitors the stripper vent condenser temperature with an alarm system that is activated when the temperature exceeds 0°C. The compliance demonstration shows that when the temperature remains at or below 0°C the site-wide VOC emission reduction is at a minimum of 92.7%. Additionally, 40 CFR Part 63, Subpart U, is applicable to certain P-1 through P-5 emission points and the monitoring requirements as specified in the MACT standard shall apply.
- ii. **TAPs** - The source shall keep records showing that the modeling parameters have not changed for chloroprene and toluene. For the other TAPs the source shall document process changes to demonstrate that the process changes do not involve a net emissions increase.
- iii. **PM** - For all emission points subject to Regulation 6.09 or 7.08: There are no monitoring, record keeping, or reporting requirements for emission points 200G(1-4), 201(A-F), 202A, and 202S(1-4,9,&10) in emission unit P-1. The source has submitted uncontrolled one-time compliance demonstrations that show the PM emission limitation at maximum PM handling rates cannot be exceeded. Thus, the designation of "regulatory allowable" has been used in place of a specific numeric PM emission limitation. There are no record keeping or reporting requirements for the PM emission standard for emission points 202D (1,2,&3). The source has submitted controlled one-time compliance demonstrations that show that the PM emission limitation at maximum PM handling rates cannot be exceeded. The maximum control efficiency needed was 90% for emission point 202D3, 85% control efficiency for emission point 202D1, and emission point 202D2 does not need a control device to meet the standard. Since

they are all controlled by the same control device, and the minimum efficiency expected is at least 90% the District has not required record keeping, reporting, or stack testing. But, for emission points 202D(1,2,&3), there is monthly parametric monitoring on the associated control device (C202D - filter system). This monitoring consist of monthly visible inspections to check for deterioration in the device. There is also, associated record keeping and reporting for the control device.

- iv. **Opacity** - For all emission points subject to Regulation 6.09 or 7.08 in emission unit P-1: The source is required to perform weekly visible emissions surveys. Emission points that are observed for twelve consecutive operating weeks to be free from visible emissions of particulates are eligible for monthly monitoring. However, any emission points that are monitored monthly that are observed to have visible emissions of particulates are required to return to the weekly monitoring schedule for at least another twelve-week period. Emission points with fugitive particulate emissions that do not reach the fence line of the property are not subject to the requirement for visible emission surveys. The periodic visible emissions surveys, coupled with Method 9 observations, if necessary, are adequate to demonstrate compliance with the applicable opacity standard.

c. Emission Units F-1 through F-3:

- i. **VOC** - The source shall keep daily records of the number of charges of 'dry types' processed in emission units F-1 through F-3 and use calculation methodology similar to that in the Regulation 6.24 compliance demonstration, to demonstrate compliance with Regulation 6.24. The Regulation 6.24 compliance demonstration shows that the stripper vent condensers (emission unit P-4) contribute over 90% of the required 85% VOC emission reduction. The source continuously monitors the stripper vent condenser temperature with an alarm system that is activated when the temperature exceeds 0°C. The compliance demonstration shows that when the temperature remains at or below 0°C the site-wide VOC emission reduction is at a minimum of 92.7%. Additionally, 40 CFR Part 63, Subpart U, is applicable to certain F-1 through F-3 emission points and the monitoring requirements as specified in the MACT standard shall apply.
- ii. **TAPs** - The source shall keep records showing that the modeling parameters have not changed for toluene. For the other TAPs the source shall document process changes to demonstrate that the process changes do not involve a net emissions increase.

- iii. **PM** - For all PM emission points in emission units F-1 through F-3, the source has submitted one-time compliance demonstrations that the PM emission limitation at maximum PM handling rates cannot be exceeded. Thus, the designation of "regulatory allowable" has been used in place of a specific numeric PM emission limitation. For emission unit F-1: There is no monitoring, record keeping, or reporting requirements for emission point 301E and the associated control device C301E (filter), since, the one-time compliance demonstration showed that the control device was not needed to meet the standard. There are no record keeping or reporting requirements for the PM emission standard for emission points 301F(1-3). The source has submitted controlled one-time compliance demonstrations that show that the PM emission limitation at maximum PM handling rates cannot be exceeded. The maximum control efficiency needed was 88% for emission points 301F(1-3). Since they are all controlled by the same control device, and the minimum efficiency expected is at least 90% the District has not required record keeping, reporting, or stack testing. But, for emission points 301F(1-3), there is monthly parametric monitoring on the associated control device (C301F-filter system). This monitoring consist of monthly visible inspections to check for deterioration in the device. There is also, associated record keeping and reporting for the control device. For emission unit F-3 (including some emission points in F-2 that share the same control devices): The source is required to visually inspect, on a monthly basis, the fabric filters (C305E, and C307C), and the secondary filters (C306(C/D)).

In addition, the source is required to monitor and respond to the broken bag detectors for the baghouses (C306(A/B)). Since the control device efficiency needed to meet the standard was approximately 99.3% there is also PM stack testing, in accordance with EPA reference Test Method Five (5), requirement in the permit. In addition, due to the control device efficiency needed, there is record keeping and reporting requirements for talc usage. DuPont Dow uses talc to keep freshly cut, sticky Neoprene product "chips" from sticking together in the bags. To accomplish this, the facility has an extensive system of talc handling equipment which uses the baghouses (C306 (A/B)) to collect and recycle excess talc from several pieces of product handling and packaging equipment. Because the objective is product quality and customer satisfaction, rather than an intrinsic addition to the product composition, the facility has never required the finishing operation to keep detailed records of the amount of talc added to this system to maintain the system inventory at optimal levels. For the purposes of the Title V operating permit, DuPont Dow proposes to estimate talc addition rates by using existing recordkeeping systems of talc deliveries and monthly inventory of the number of talc supersacks. The monthly talc usage

would be determined by weight of material delivered during a calendar month plus the change in inventory from the beginning of the month to the end of the month. The average daily or hourly talc addition rate would be calculated by dividing the monthly talc usage by the number of days or hours in the month.

- iv. **Opacity** - For all emission points subject to Regulation 6.09 or 7.08 in emission units F-1 through F-3, the source is required to perform weekly visible emissions surveys. Emission points that are observed for twelve consecutive operating weeks to be free from visible emissions of particulates are eligible for monthly monitoring. However, any emission points that are monitored monthly that are observed to have visible emissions of particulates are required to return to the weekly monitoring schedule for at least another twelve-week period. Emission points with fugitive particulate emissions that do not reach the fence line of the property are not subject to the requirement for visible emission surveys. The periodic visible emissions surveys, coupled with Method 9 observations, if necessary, are adequate to demonstrate compliance with the applicable opacity standard.

d. Emission Units X-1, X-2, and MSC:

- i. **VOC** - For each day that the extruder (emission unit X-2) is in operation, the source shall keep daily records of the material throughput. These records shall be used to calculate emissions to demonstrate compliance with calendar year VOC emission limit established under Regulation 7.25. The source shall keep the records required in Regulations 6.18 and 7.18 for the parts washers in emission unit MSC.
- ii. **TAPs** - The source shall keep records showing that the modeling parameters have not changed for toluene. For the other TAPs the source shall document process changes to demonstrate that the process changes do not involve a net emissions increase
- iii. **PM** - For all emission points subject to Regulation 6.09 in emission units X-1 and MSC, the source has submitted one-time compliance demonstrations that the PM emission limitation at maximum PM handling rates cannot be exceeded. Thus, the designation of "regulatory allowable" has been used in place of a specific numeric PM emission limitation. For emission unit X-1: The source submitted uncontrolled one-time compliance that showed the PM emission standard could not be exceeded. Therefore, no monitoring, record keeping, and reporting requirements are needed for compliance demonstration. For emission unit MSC: There are no monitoring,

record keeping, or reporting requirements for emission points 501(A&C), since the control device was replaced by a non-regulated control device qualifying fully for treatment as insignificant activities. There is no record keeping or reporting requirements for the PM emission standard for emission point 501B. The source has submitted controlled one-time compliance demonstrations that show that the PM emission limitation at maximum PM handling rates cannot be exceeded. The maximum control efficiency needed was 78% for emission point 501B. Since the minimum efficiency expected is at least 90% the District has not required record keeping, reporting, or stack testing. But, for emission point 501B, the source is required to visually inspect, on a monthly basis, the cyclone (C501B) for deterioration in the device. There is also associated record keeping and reporting for this control device.

- iv. **Opacity** - For all emission points subject to Regulation 6.09 in emission units X-1 and MSC, the source is required to perform weekly visible emissions surveys. Emission points that are observed for twelve consecutive operating weeks to be free from visible emissions of particulates are eligible for monthly monitoring. However, any emission points that are monitored monthly that are observed to have visible emissions of particulates are required to return to the weekly monitoring schedule for at least another twelve-week period. Emission points with fugitive particulate emissions that do not reach the fence line of the property are not subject to the requirement for visible emission surveys. The periodic visible emissions surveys, coupled with Method 9 observations, if necessary, are adequate to demonstrate compliance with the applicable opacity standard.

6. Off-Permit Documents:

<u>Document</u>	<u>Date</u>
Risk Management Plan	June 15, 1999
1.18 Rule Effectiveness Plan	September 20, 1994
1.05 VOC Compliance Plan	March 22, 1993
TAP (toluene) Plant wide Modeling	October 1987
TAP (hydrochloric acid) Plant wide Modeling	April 1993
TAP (hydrochloric acid) Emission Unit P-3 Modeling	October 1997

VOC Compliance Demonstrations for Regulations 6.24 & 6.22	November 27, 2000
PM One-Time Compliance Demonstrations	November 27, 2000
VOC Compliance Demonstrations for Regulations 6.43 & 7.25	December 18, 2000
VOC Compliance Demonstrations for Regulation 6.43 and 7.25	February 15, 2002
VOC Compliance Demonstrations for Regulation 6.24	February 15, 2002
Notification of Compliance Status for non-equipment leaks	November 16, 2001
Notification of Compliance Status Addendum, Heat Exchange Systems	July 8, 2002
Notification of Compliance Status (LDAR)	December 29, 1997
Notification of Compliance Status (LDAR) Corrections	February 24, 1998

The District considers an "off-permit document" as a document on which a source's compliance with any given regulation(s) is contingent upon or which contains regulatory requirement(s), but is only referenced in a source's Title V Operating Permit. The designation "off-permit document" shall be made at the District's discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, Preventive Maintenance Programs (PMPs), Management of Change Systems (MOCs), or other documents which are too voluminous to be included in a source's Title V Operating Permit, as determined by the District.

III. Other Requirements

- 1. Temporary Facilities:** The source did not request to operate any temporary facilities.
- 2. Short-Term Activities:** The source did not report any short-term activities.
- 3. Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no schedule of compliance or progress reports are necessary. Additionally, the source identified in its original permit application applicable Federal and District regulations in effect at the time of the permit application submittal. This permit grants a permit shield based upon the District's

review of the source's permit application and the source's request for the permit shield.

- 4. **Emissions Trading:** None
- 5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- 6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone-depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. The source currently uses R-22 refrigerant (chlorodifluoromethane) in one of its process refrigeration machines; the remaining machines use a non-regulated refrigerant. The source also has a fire suppression system in the computer room in the Administration Building that uses Halon 1301 (bromotrifluoromethane). Bromotrifluoromethane is a Class I - Group II compound under Title VI of the Act. Chlorodifluoromethane is a Class II compound under Title VI of the Act and the source shall comply with all applicable Title VI requirements of 40 CFR Part 82, *Protection of Stratospheric Ozone*.
- 7. **Prevention of Accidental Releases 112(r):** The source does manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding specified threshold amount, including chlorine. The required Risk Management Plan was submitted on June 15, 1999.
- 8. **Insignificant Activities:** The following activities identified in the Title V permit application have been determined by the District to be insignificant.

Insignificant Activities		
Description	Quantity	Basis
Research and Development activities	various	Regulation 2.02, section 2.3.27
Internal combustion engines	various	Regulation 2.02, section 2.2
Brazing, soldering, or welding equipment	various	Regulation 2.02, section 2.3.4
Woodworking, not including hogging or burning	various	Regulation 2.02, section 2.3.5
Emergency relief vents and ventilating systems (not otherwise regulated)	various	Regulation 2.02, section 2.3.10
Lab ventilating and exhausting systems for nonradioactive materials	various	Regulation 2.02, section 2.3.11

Insignificant Activities		
Description	Quantity	Basis
Portable diesel tanks or gasoline storage tanks of less than 250 gallons	various	Regulation 2.02, section 2.3.23
Welding ventilation system	various	Regulation 2.02, section 2.3.4
Chlorine tankcar unloading (< 1 lb/yr emissions by calculation)	various	No applicable regulation
Acetic acid tankcar unloading (cold weather warming operations)	various	No applicable regulation
Resin/Rosin unloading	various	No applicable regulation
Dust Collector for Wastewater filtration (vents inside building)	various	Regulation 2.02, section 2.3.21
Miscellaneous Totes and Drums (all emission units)	various	No applicable regulation
Label Operation	various	No applicable regulation
Coagulation Basin Operation	various	No known regulated emissions
Waste Polymer Handling	various	No applicable regulation
Maintenance Spray Painting (Pump Shop)	various	EPA White Papers

- A. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- B. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- i. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
 - ii. No periodic monitoring shall be required for facilities designated as insignificant activities.

- C. The Insignificant Activities table is correct as of the date of the permit was proposed for review by the USEPA, Region 4. The company shall submit an updated list of insignificant activities annually with the Title V compliance certification pursuant to District Regulation 2.16, section 4.3.5.3.6.